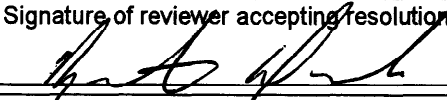


412.13  
02/20/2001  
Rev. 05

# DOCUMENT MANAGEMENT CONTROL SYSTEM (DMCS) REVIEW COMMENTS AND RESOLUTIONS

Tracking No.: \_\_\_\_\_  
(Optional)

Technical Point of Contact:	Phone No.:	Return Comments To:	MS:	E-Mail:	Comments Due By:	Reviewer's Name/Discipline: USEPA Region X Comments	Phone No.:
Comments resolved by: Brandon Smith		Date: 04/03/01	Signature of reviewer accepting resolution of significant comments: 			Date: 10/3/01	

\* Comments so marked are considered to be significant and must be resolved to the reviewer's satisfaction. *Significant comment.* A reviewer's written response that is derived from the reviewer's area of expertise or discipline or that addresses material assigning tasks to the reviewer's organization. Significant comments address issues of: A. noncompliance with laws, regulations, permits, standards, B. proper conduct of mission-critical operations, C. creating unsafe conditions that could result in personal injury, death, damage to the environment, D. creating conditions that could result in significant nonessential costs to the company.

Document ID: DOE-ID/10838		Document Title: RD/RA Work Plan for OU3-13, Group 6, Buried Gas Cylinders			Revision ID: Rev. B	DAR No.:
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1	Appendix A		It is good to see the costs broken out by activity and date	None Required		
2	Page 3-1, Section 3		Rather than state "all" reference should be made to a listing of specific requirements under DOE Orders, BMP's, OSHA, federal & state laws, etc.	This information will be added as requested in the form of a list.		
3	Page 3-2, Section 3.1.3,	*	Disposal of the cylinders needs to be in compliance with 40 CFR 300.440  A suitability determination is needed for the acceptability of this waste at the CFA landfill	This section was revised to indicate that the cylinders will be characterized using established INEEL procedures to ensure that cylinders meet the INEEL landfill Waste Acceptance Criteria. This section will be further revised to state that cylinders not meeting the INEEL landfill WAC may be disposed of in the ICDF to be consistent with section 4.2, assumption 4. This section was reworded to specify that a suitability determination will be completed in accordance with 40 CFR 300.440 and submitted to the Agencies for those wastes shipped off of the INEEL (off-sight).		
1	Page 3-2, Figure 3-1		The conceptual model, which may be in error, is that only cylinders were buried at CPP-84  See comment on Table 3-1	All of the evidence that has been reviewed concerning the potential waste buried at CPP-84 indicates that only cylinders will be retrieved. This is further supported by the fact that when CPP-94 waste excavated, the only waste encountered was what was expected. However, in the event that something other than what is excepted is encountered, language will be added to RD/RA and the Waste Management Plan (attachment 4 of the RD/RA) addressing how to manage these other		

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				<p>wastes.</p> <p>A statement has been added to the text of Section 3-1 stating that while all of the available evidence shows only cylinders are buried in area 84, if other wastes are identified, they will be addressed on a case by case basis in accordance with the Waste Management Plan. In addition, depending on what wastes are found, additional COPCs may need to be sampled for beyond what is addressed in Table 3-2.</p> <p>Language has been added to section 6 of the Waste Management Plan to address the proper of other wastes.</p> <p>Language has been added to Section 4.2 under the "Status of Assumption #3" addressing the management and disposition of "other" wastes.</p>	
2	Page 3-3, Section 3.2.1		<p>Reference the basis for assuming that cylinders are limited to 48" depth is not provided.</p> <p>For example, EDF, interviews, etc.</p>	<p>The magnetometer will read 48-inches below grade, so the depth of investigation will always be 48 inches below the existing grade of the excavation (eight feet or deeper). In addition, this section will be revised to state that the 48" depth for taking magnetometer readings is based on the maximum anticipated depth of burial based on the available data.</p>	
3	Page 3-4, Table 3-1		<p>The assumption is that only cylinders are buried and no other construction debris e.g., empty paint case, construction rubble, etc.</p> <p>Add a second PSQ in Step 2, "verify that only cylinders are disposed of.." This can be through an observational approach. If other wastes are disposed, the COPCs at Table 3-2 may change.</p>	<p>See the response to comment 1 above.</p> <p>The following sentence was added to section 3.2 to address COPCs to be evaluated should other wastes be identified:</p> <p>"The table only addresses COPCs that may be present due to the waste types expected to be excavated. If other waste types are identified</p>	

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				during the process, additional parameters will be evaluated on a case by case basis."	
4	Page 3-5, Table 3-2, Step 6		The basis for selecting an 80% versus a 95% confidence level needs to be explained.	The sampling effort is considered a 'preliminary site investigation' whose purpose is to "provide information for initial management decisions and to determine if further investigation is deemed necessary" ( <i>EPA's Soil Sampling Quality Assurance Users Guide; EPA/600/8-89/046</i> ). Per EPA's guidance, an 80% confidence level is adequate for such decisions. If contamination exceeds the action levels listed in Table 2-2 of the Characterization Plan, then additional sampling and/or remediation would be completed as part of a corrective action.	
5	Page 3-5, Table 3-2, Step 7	*	Depending on the spatial extent of the cylinders in the excavated area, it is unclear why biased sampling wouldn't be conducted at the locations where cylinders were removed?	<p>The text will be revised to include a biased sampling method. The same grid will be used but grid squares that do not contain cylinders will be crossed out and will not be included in the random selection of squares for sampling. This will allow the sampling to conform as near as possible to the EPA guidance but will incorporate a bias towards the cylinder locations.</p> <p>The comment also brings up an excellent point: the visual evidence of contamination (e.g. discoloration, soil moisture) would justify the use of biased (judgmental) samples during a preliminary site investigation. Consequently, text will be added to state "if visual evidence indicates the potential for soil contamination (e.g. obvious differences in soil color, moistness, or texture), biased (judgmental) samples will be collected to characterize the anomaly".</p>	

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6	Page 3-6, Section 3.3.3		Where is the draft pre-final inspection checklist?  Should be a component of the draft RAWP	This, as well as a schedule, will be added to the document once developed.	
7	Page 4-2, Section 4.2, Assumption 2		The basis for determining that the risk is "unacceptable" should be referenced.	Subjective criteria have been added to this section defining what "unacceptable risk" is as it pertains to this issue.	
8	Page 4-3, Section 4.2, Assumption 4	*	This appears inconsistent with statement made at Section 3.1.3. Also, disposal of the CERCLA waste will be at a suitable facility. The ICDF is being designed to manage PCB and hazardous waste generated from onsite CERCLA actions.	This assumption is per the ROD. Section 3.1.3 has been revised to indicate that cylinders not meeting the Landfill Complex WAC may be disposed of in the ICDF in accordance with this assumption. Wording has been added to specify that the acetylene cylinders are to be managed at an off-site facility due to environmental and waste management concerns.	
9	Page 4-4, Section 4.3 Item #4		Besides regulatory and reportable quantity limits; there is also short-term risk concerns.	A sentence will be added to this section indicating health and safety risks associated with these activities are mitigated through the implementation of the Health and Safety Plan.	
10	Page 4-4, Section 4.4.	*	It should be identified that Table 4-1 is a reprint of table 12-6 with the exception that the comments section has substantive changes.  An explanation should be provided for each change from the ROD language. Otherwise, the Comments section may inadvertently serve to modify the	The following sentence has been added to the end of section 4.4 which introduces table 4-1:  "Table 4-1 is a reprint of Table 12-6 of the ROD with the exception of the "Comments" column. The "Comments" column has been substantially modified from what is in ROD Table 12-6 to meet the specific needs of this work plan. These changes do not imply that the ROD has been modified, they are only applicable to the context of this work plan."	
11	Page 4-7, Table 4-1	*	The comment on 40 CFR 261 is not from the ROD and treatment must be in accordance with the approved RD/RAWP regardless of RCRA/HWMA status	Reference to the HF treatment has been removed from the "Comments" column as it has no applicability under this ARAR.	
12	Page 5-2, Section 5.2		Should include that the excavation process will be photo-documented.	A sentence has been added stating that excavation activities will be photo-documented.	
13	Page 5-6, Section 5.8		See prior comment regarding need for biased sampling.	See response to Comment #5	

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14	Page 6-3 Section 6.9		The pre-final inspection will be conducted by representatives for the agencies.	This section has been revised to read "the pre-final inspection will be conducted by the agencies or their representatives."	
15	Page 6-3 Section 6.9		A draft checklist should be included as part of the RAWP	This will be included once developed.	
16	Page 6-3 Section 6.9	*	The documentation should be sufficient to support that no further remedial action (to include institutional controls) is required.	The last bullet of this section has been revised to read:  "Documentation necessary to support a notice of completion as discussed in Part XXV of the FFA/CO (DOE-ID, 1991). The documentation will be sufficient to support that no further remedial action, including institutional controls, is required."	
17	Page 6-6 Section 6.16		Periodic evaluation of "clean" shallow excavation areas does not justify FFA/CO O&M procedures. The backfill should be sufficient to allow for compaction.	This section has been revised as follows:  "An Operations and Maintenance plan is not required because the remedy is for complete removal of the hazard. The excavation will be filled with a suitable backfill material that will allow for compaction. The area will be evaluated for subsidence as part of the 5-year project review."	
18	Page 6-11, Figure 6-3		Removal of underlying debris should also be a criterion before proceeding to sampling and surveys.	This has been added as requested.	
19	Page 7-6 Section 7.3		What "complete process engineering diagrams and operating procedures will be available at the job site?"  The RD/RAWP should contain the relevant process diagrams and operating procedures.	Section 7.3 has been revised to describe the process flow for each of the proposed treatment processes. Sufficient detail has been added to demonstrate the effectiveness of the treatments for the given waste types. The detailed operating procedures will not be included in the RD/RA Work Plan, but will be available at the job site.	
20	Page 7-6 Section 7.3	*	Where are the procedures for thermal oxidation and other treatment identified in Figure 7-1?	Section 7.3 has been revised to address all of the proposed treatments as described in the response to comment 19 above. The detailed	

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				procedures will be at the job site.	
21	General comment	*	Comments made above also apply to the attachments where the issue is repeated.	The comments described above have been consistently applied to each of the attachments, and revisions have been made to each attachment as applicable.	
22	Attachment 4 Page 6-1 Section 6	*	All wastes will be managed and stored as "CERCLA" wastes in compliance with the ARARs identified in the 3-13 ROD.	This section will be revised to clearly indicate that CERLCA wastes will be managed in accordance with the ARARs.	
23	Attachment 4 Page 6-2 Section 6.5	*	Wastes generated will be managed in accordance with 40 CFR 300.440. A suitability determination will be needed to send CERCLA wastes to the CFA landfill.	See response #3. Section 6.6 of the Work Plan has been reworded accordingly. Section 7.0 of the Waste Management Plan has been reworded to address the off-site policy.	